

Regional Water Quality Control Board  
Central Valley Region  
Board Meeting – 12/13 June 2008

Response to Written Comments for  
Roney Land and Cattle Company, Inc., and  
7/11 Materials Inc.  
Pine Creek Gravel Operation  
Tentative Waste Discharge Requirements

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The following is a response to written comments received from an interested party in response to the Tentative Waste Discharge Requirements for the Roney Land and Cattle Company, Inc., and 7/11 Materials Inc. – Pine Creek Gravel Operation issued on 11 April 2008. Written comments from interested parties on the proposed Order were required to be received by the Regional Water Quality Control Board (Regional Water Board) by noon on 14 May 2008 in order to receive full consideration. Comments were received by the due date from the following party:

1. Law Office of William A. Ward (representing Roney Land and Cattle Co., Inc.)

Written comments from the above interested party are summarized below, followed by the response of the Regional Water Board staff.

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**LAW OFFICE OF WILLIAM A. WARD COMMENTS**

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**COMMENT #1:** The findings of the Regional Water Board are incomplete unless and until a Registered Civil Engineer prepares a drainage study that calculates the annual onsite and offsite flows for surface water and storm water to quantify whether the existing pond system will be adequate to contain all flows.

**RESPONSE**

The tentative waste discharge requirements (WDRs) are adequate and consider the need for additional information from the Discharger. Regional Water Board staff inspected the Facility on 22 February 2008. The inspection revealed that the management of gravel wash water and storm water for the site is complicated, and is likely to change in the future with adoption of a revised reclamation plan. Therefore, the tentative WDRs, Provision D.4.a require the Discharger to submit the revised reclamation plan by 15 July 2008 or 15 days after its adoption if not adopted by 15 July 2008. After Regional Water Board review of the Plan, the WDRs allow the Regional Water Board to require a hydraulic balance for current and/or future pond systems. The Facility is currently in operation without WDRs. Adoption of the tentative WDRs prior to completion of the revised reclamation plan will give the Regional Water Board direct regulatory authority to oversee the Facility and ensure that water quality is protected. If necessary, the Regional Water Board may require any additional information from the Discharger pursuant to a Water Code Section 13267 order or a Cease and Desist order.

BJS/JMM  
05/19/2008